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CREATIVE ART PARTNERS, LLC
7 MARTIN SIMONE
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8 MACOY CAPITAL MORTGAGE, LLC
ALLSTATE LENDING GROUP, INC.
9

10 UNITED STATES BANKRUPTCY COURT
11 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

12 In re Case No. 8:25-bk-11409-SC
13 CHANTILLY ROAD, LLC, Chapter 7
14 Alleged Debtor.
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NOTICE OF PETITIONING CREDITORS'
MOTION TO APPOINT INTERIM
TRUSTEE PURSUANT TO 11 U.S.C.
§ 303(g)

Hearing:
Date: July 29, 2025
Time: 11:00 a.m.
Ctrm: 5C
Place: 411 W. 4th Street
Santa Ana, California 92701

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21 TO THE HON. SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY COURT JUDGE,
22 THE OFFICE OF THE UNITED STATES TRUSTEE, AND INTERESTED PARTIES:

23 PLEASE TAKE NOTICE that on July 29, 2025, at 11:00 a.m., in Courtroom 5C, of the
24 above-entitled Court, a hearing will be held on the motion (“Motion”) filed by Petitioning Creditors,
25 Creative Art Partners, LLC, Martin Simone, Frank & Simone LLP, Macoy Capital Mortgage, LLC,
26 and Allstate Lending Group, Inc. (collectively, “Petitioning Creditors”), to Appoint Interim Trustee
27 Pursuant to 11 U.S.C. § 303(g).
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1 In this case, the Debtor's only asset is a \$20+ million mansion located in the exclusive Bel
2 Air community and commonly known as 1116 Chantilly Road, Los Angeles, CA 90077
3 ("Property"). The Debtor, however, does not seek to prevent the loss of the Property in a foreclosure.
4 Instead, the Debtor's insider or affiliate, CSPRF2, has filed a motion for relief from stay so that it
5 can foreclose on the Property and leave the estate and its creditors with nothing. Appointment of an
6 interim trustee is necessary to preserve the property of the estate and to prevent loss to the estate.

7 **PLEASE TAKE FURTHER NOTICE:** If you do not oppose the Motion described above,
8 you need take no further action. However, if you object to the Motion, pursuant to local bankruptcy
9 rule 9013-1, any opposition must be filed with the court no later than 14 days prior to the date of the
10 hearing on the Motion. You must file your opposition with the Clerk of the United States
11 Bankruptcy Court. You must also serve a copy of your objection upon D. Edward Hays and Sarah R.
12 Hasselberger no later than 14 days prior to the date of the hearing on the Motion at the mailing
13 address indicated in the upper left corner of the first page of this notice, and upon the Office of the
14 United States Trustee at 411 W. Fourth Street, Suite 7160, Santa Ana, CA 92701. Any failure to
15 timely file and serve an opposition may result in a waiver of any such opposition and the court may
16 enter an order granting the motion without further notice.

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18 Dated: July 8, 2025

MARSHACK HAYS WOOD LLP

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By: /s/ D. Edward Hays
D. EDWARD HAYS
Attorneys for Petitioning Creditors,
CREATIVE ART PARTNERS, LLC
MARTIN SIMONE
FRANK & SIMONE, LLP
MACOY CAPITAL MORTGAGE, LLC
ALLSTATE LENDING GROUP, INC.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF PETITIONING CREDITORS' MOTION TO APPOINT INTERIM TRUSTEE PURSUANT TO 11 U.S.C. § 303(g)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 8, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On July 8, 2025, I delivered the document(s) described above via email to Omni Agent Solutions, Trustee's claims and noticing agent, for service on the interested persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid and addressed per the adversary mail matrix. Upon completion of the mailing by Omni Agent Solutions, Trustee will file a Certificate of Service listing the parties served by Omni Agent Solutions at the address at which they were addressed.

DEBTOR

CHANTILLY ROAD, LLC
c/o PENNY M. FOX, CPA
15615 ALTON PARKWAY, SUITE 450
IRVINE, CA 92618

DEBTOR

CHANTILLY ROAD, LLC
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR TO
ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR
LAW TO RECEIVE SERVICE OF PROCESS
1207 DELAWARE AVE., STE. 2992
WILMINGTON, DE 19806

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 8, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PRESIDING JUDGE'S COPY - VIA PERSONAL DELIVERY

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 8, 2025
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

- **ATTORNEY FOR PETITIONING CREDITORS:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR SECURED CREDITOR CSPRF 2 LLC:** Gabriel P Herrera ghererra@kmtg.com, bxiong@kmtg.com
- **INTERESTED PARTY COURTESY NEF:** Harry D. Hochman hhochman@pszjlaw.com, hhochman@pszjlaw.com
- **INTERESTED PARTY COURTESY NEF:** Harris M Madnick hmmadnick@kramarmadnick.com
- **ATTORNEY FOR DEBTOR CHANTILLY ROAD, LLC:** Richard Morin legal@rickmorin.net
- **ATTORNEY FOR SECURED CREDITOR CIVIC REAL ESTATE HOLDINGS III, LLC:** Richard M Pachulski rpachulski@pszjlaw.com
- **ATTORNEY FOR PETITIONING CREDITORS:** Laila Rais lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: CONTINUED:

SECURED CREDITOR

CSPRF 2 LLC
C/O DAVID BLATT
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SECURED CREDITOR

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SECURED CREDITOR

CSPRF 2 LLC
C/O KRONICK MOSKOVITZ
TIEDEMANN & GIRARD
1331 GARDEN HWY FL 2
SACRAMENTO CA 95833

SECURED CREDITOR

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JONES LLP
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LOS ANGELES, CA 90067

DEBTOR'S COUNSEL

RICHARD MORIN
LAW OFFICE OF RICK MORIN, PC
21163 NEWPORT COAST DRIVE
#206
NEWPORT COAST, CA 92657

U.S. TRUSTEE

OFFICE OF THE UNITED STATES
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411 WEST FOURTH STREET
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PETITIONING CREDITOR

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MACOY CAPITAL MORTGAGE, LLC
MITCH OHLBAUM, PRESIDENT
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PETITIONING CREDITOR

ALLSTATE LENDING GROUP, INC.
MIKE SCANNELL, CEO
2540 CORPORATE PLACE, #B-108
MONTEREY PARK, CA 91754-0000